

## REMARKS

In the above-identified office action, Examiner has rejected Claim 25 under 35 U.S.C. §102(b) for being anticipated for being anticipated by Nitis, et al. U.S. 6,012,527. It is noted, however, from the Nitis, et al. disclosure that the component that the Examiner views as similar to the device claimed in Claim 25 is a part of a casing string required to be assembled at surface. Referring to Figure 3, it will be plainly clear to the Examiner that the inside dimension of component 18 is restricted in diameter in the profiled area near the lead line of numeral 20. The Examiner will also easily appreciate that the outside dimension of the device indicated by numeral 19 in Figure 3 (although that numeral designation is incorrect with respect to the specification of the '527 reference) is larger than the smaller inside diameter of component 18, meaning that it cannot possibly be installed in that casing joint 18 after installation of the joint in the wellbore. In Claim 25 of the present application, the sleeve is indeed installable after the casing in the wellbore. Applicant has therefore amended Claim 25 to specifically recite that the device is installable subsequent to installation of a casing in a wellbore. This is clearly distinguished from the Nitis, et al. reference, and Applicant therefore requests withdrawal of the rejection.

Claims 29, 30 and 12-13 have been rejected under 35 U.S.C. §102(b) for being anticipated by Owen, et al., U.S. 3,712,376. It is noted that the Examiner believes that numerals 11 and 13 which are found in Figure 12 inherently are capable of rotationally orienting a tool. It is pointed out by Applicant that in column 11 of the '376 patent the statement "Liner 13 has a stabbing section 111 comprising an inverted frusto-conical section. As illustrated, top portion 111 has notches 113 to allow room for extrusion of metal thereinto during the passage of the swage means through liner 13." This does not teach rotational orientation of another tool. In fact, the orientation of a tool passing through such device will remain as it was prior to reaching such device. Therefore, no orientation occurs. As such, the reference does not teach all of those limitations present in Claims 29 and 30, and therefore a rejection thereover cannot be properly maintained. As to Claims 12-13, as there is no orientation profile disclosed, taught, or even suggested within Owen, et al., these claims possess limitations not taught within the reference, and are patentable thereover in their right.

For the foregoing reasons, it is believed that the present application is in condition for allowance, which action is earnestly solicited.

In the event the Examiner has any queries regarding the instantly submitted Amendment, Applicant's attorney respectfully requests the courtesy of a telephone conference to discuss any matters in need of attention.

In the event that there are any fees due with respect to this Response, Applicant's attorney respectfully requests that such fees be withdrawn from Deposit Account No. 02-0429.

Respectfully Submitted,

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